

Exhibit D

UNITED STATES DISTRICT COURT
IN THE EASTERN DISTRICT OF MICHIGAN

CRYSTAL ATALLAH,
Plaintiff,

-vs.-

Case No. 2:12-cv-11618-GER-RSW
Hon. Gerald E. Rosen
Mag. R. Steven Whalen

LAW OFFICES OF TIMOTHY E. BAXTER, P.C.
a Michigan professional corporation,
Defendant.

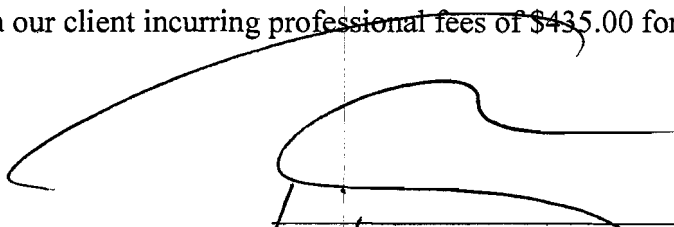
AFFIDAVIT OF PLAINTIFF'S COUNSEL

State of Michigan }
 }ss
County of Oakland }

I, Travis L. Shackelford, hereby state under oath that if called to testify in this case,
would plead as follows:

1. I am an attorney licensed to practice in the state of Michigan, Connecticut and Texas.
2. I have been licensed to practice law since 2005.
3. My usual and customary hourly rate for work that I perform on this basis is \$290.00 per hour.
4. My hourly rate is normal, if not average for an attorney with my experience and background working in Oakland County, Michigan.
5. I have spent 1.5 hours working on this litigation as is broken down on the attached spreadsheet, resulting in our client incurring professional fees of \$435.00 for my time.

Further Affiant Saith Not.



Travis L. Shackelford
Attorney for Plaintiff

Subscribed and sworn to before me
this 14 day of May 2012.

Bonny A. M. M. M.

Notary Public, Oakland County, MI

My commission expires: 10/2/2012

		Atallah v The Law Offices of Timothy Baxter					
		Accounting of fees and costs					
		As of May 2, 2012					
						Cumulative	
Keeper	Date	Service	Time	Rate	Fees	Fees	
JL	3/29/2012	Review of file. Interview of client. Received initial docs, created pending files.	1	\$ 140.00	\$ 140.00	\$ 140.00	
ML	3/29/2012	Started a CM file	0.5	\$ 140.00	\$ 70.00	\$ 210.00	
JL	3/30/2012	timeline, emailed to Client for review, confirmed timeline, updated file in CM, prepared physical file for GN	1.5	\$ 140.00	\$ 210.00	\$ 420.00	
GN	4/8/2012	Review Timeline and Case, drafted complaint, updates to systems	1.75	\$ 300.00	\$ 525.00	\$ 945.00	
BM	4/10/2012	Efile of complaint and updates to systems	0.75	\$ 140.00	\$ 105.00	\$ 1,050.00	
BM	4/11/2012	Summons received, Certify mailed complaint, updates to systems	0.5	\$ 140.00	\$ 70.00	\$ 1,120.00	
BM	4/18/2012	Efiled POS, updates to systems	0.5	\$ 140.00	\$ 70.00	\$ 1,190.00	
GN	4/23/2012	Reviewed Defendants Offer of Judgment	0.5	\$ 300.00	\$ 150.00	\$ 1,340.00	
BM	4/25/2012	Drafted Acceptance of Offer of Judgment	0.7	\$ 140.00	\$ 98.00	\$ 1,438.00	
GN	4/25/2012	Review of Draft	0.3	\$ 300.00	\$ 90.00	\$ 1,528.00	
BM	4/25/2012	E-filed Offer of Judgment w/court	0.3	\$ 140.00	\$ 42.00	\$ 1,570.00	
BM	5/1/2012	Received Judgment, system updates, scanned to GN for review.	0.3	\$ 140.00	\$ 42.00	\$ 1,612.00	
TS	5/2/2012	Drafted Motion for Attorney fees and Costs	1.5	\$ 290.00	\$ 435.00	\$ 2,047.00	
LC	5/2/2012	Spreadsheet of fees and costs	0.5	\$ 140.00	\$ 70.00	\$ 2,117.00	
				\$ 300.00	\$ -	\$ 2,117.00	
				\$ 300.00	\$ -	\$ 2,117.00	
				\$ 300.00	\$ -	\$ 2,117.00	
				\$ 300.00	\$ -	\$ 2,117.00	
				\$ 140.00	\$ -	\$ 2,117.00	

Exhibit E

UNITED STATES DISTRICT COURT
IN THE EASTERN DISTRICT OF MICHIGAN

CRYSTAL ATALLAH,
Plaintiff,

-vs.-

Case No. 2:12-cv-11618-GER-RSW
Hon. Gerald E. Rosen
Mag. R. Steven Whalen

LAW OFFICES OF TIMOTHY E. BAXTER, P.C.
a Michigan professional corporation,
Defendant.

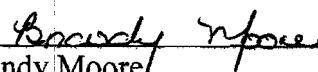
AFFIDAVIT OF PARALEGAL

State of Michigan }
 }ss
County of Oakland }

I, Brandy Moore, hereby state under oath that if called to testify in this case, would plead as follows:

1. I am a paralegal at the law offices of Nitzkin & Associates, and assisted Gary Nitzkin in the above captioned matter.
2. My usual and customary hourly rate for work that I perform on this basis is \$140.00 per hour.
3. My hourly rate is normal, if not average for a paralegal with my experience and background working in Oakland County, Michigan.
4. I have spent 3.05 hours working on this litigation as is broken down on the attached spreadsheet, resulting in our client incurring paralegal fees of \$427.00.

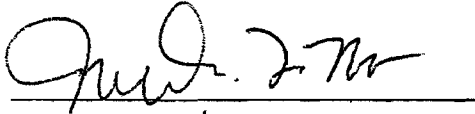
Further Affiant Saith Not.



Brandy Moore/
Nitzkin & Associates

Subscribed and sworn to before me
this 14th day of May 2012.

JULIE NOEL LAMANNA
NOTARY PUBLIC, STATE OF MI
COUNTY OF WAYNE
MY COMMISSION EXPIRES Dec 24, 2015
ACTING IN COUNTY OF Oakland



Notary Public, Wayne County, MI (acting in Oakland)
My commission expires: 12-24-2015

		Atallah v The Law Offices of Timothy Baxter					
		Accounting of fees and costs					
		As of May 2, 2012					
						Cumulative	
Keeper	Date	Service	Time	Rate	Fees	Fees	
JL	3/29/2012	Review of file. Interview of client. Received initial docs, created pending files.	1	\$ 140.00	\$ 140.00	\$ 140.00	
ML	3/29/2012	Started a CM file	0.5	\$ 140.00	\$ 70.00	\$ 210.00	
JL	3/30/2012	timeline, emailed to Client for review, confirmed timeline, updated file in CM, prepared physical file for GN	1.5	\$ 140.00	\$ 210.00	\$ 420.00	
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BM	4/18/2012	Efiled POS, updates to systems	0.5	\$ 140.00	\$ 70.00	\$ 1,190.00	
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GN	4/25/2012	Review of Draft	0.3	\$ 300.00	\$ 90.00	\$ 1,528.00	
BM	4/25/2012	E-filed Offer of Judgment w/court	0.3	\$ 140.00	\$ 42.00	\$ 1,570.00	
BM	5/1/2012	Received Judgment, system updates, scanned to GN for review.	0.3	\$ 140.00	\$ 42.00	\$ 1,612.00	
TS	5/2/2012	Drafted Motion for Attorney fees and Costs	1.5	\$ 290.00	\$ 435.00	\$ 2,047.00	
LC	5/2/2012	Spreadsheet of fees and costs	0.5	\$ 140.00	\$ 70.00	\$ 2,117.00	
				\$ 300.00	\$ -	\$ 2,117.00	
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				\$ 140.00	\$ -	\$ 2,117.00	

Exhibit F

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IN THE EASTERN DISTRICT OF MICHIGAN

CRYSTAL ATALLAH,
Plaintiff,

-vs.-

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Hon. Gerald E. Rosen
Mag. R. Steven Whalen

LAW OFFICES OF TIMOTHY E. BAXTER, P.C.
a Michigan professional corporation,
Defendant.


AFFIDAVIT OF PARALEGAL

State of Michigan }
 }ss
County of Oakland }

I, Julie LaManna, hereby state under oath that if called to testify in this case, would plead as follows:

1. I am a paralegal at the law offices of Nitzkin & Associates, and assisted Gary Nitzkin in the above captioned matter.
2. My usual and customary hourly rate for work that I perform on this basis is \$140.00 per hour.
3. My hourly rate is normal, if not average for a paralegal with my experience and background working in Oakland County, Michigan.
4. I have spent 2.5 hours working on this litigation as is broken down on the attached spreadsheet, resulting in our client incurring paralegal fees of \$350.00.

Further Affiant Saith Not.


Julie LaManna

Nitzkin & Associates

Subscribed and sworn to before me
this 10th day of May 2012.

Brenda Gladis Nitzkin

Notary Public, Oakland County, MI

My commission expires: 10/2/2012

		Atallah v The Law Offices of Timothy Baxter					
		Accounting of fees and costs					
		As of May 2, 2012					
						Cumulative	
<u>Keeper</u>	<u>Date</u>	<u>Service</u>	<u>Time</u>	<u>Rate</u>	<u>Fees</u>	<u>Fees</u>	
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				\$ 300.00	\$ -	\$ 2,117.00	
				\$ 300.00	\$ -	\$ 2,117.00	
				\$ 300.00	\$ -	\$ 2,117.00	
				\$ 140.00	\$ -	\$ 2,117.00	